



6714-01-P

Federal Deposit Insurance Corporation

**Agency Information Collection Activities: Submission for OMB Review; Comment Request
Re National Survey of Unbanked and Underbanked Households**

AGENCY: Federal Deposit Insurance Corporation (FDIC).

ACTION: Notice of information collection to be submitted to OMB for review and approval under the Paperwork Reduction Act of 1995.

SUMMARY: The FDIC, as part of its continuing effort to reduce paperwork and respondent burden and as required by the Paperwork Reduction Act of 1995 (44 U.S.C. chapter 35), invites the general public and other Federal agencies to comment on the revised survey collection instrument for its third National Survey of Unbanked and Underbanked Households (“Household Survey”), currently approved under OMB Control No. 3064-0167, scheduled to be conducted in partnership with the U.S. Census Bureau as a supplement to its June 2013 Current Population Survey (“CPS”). The collection is a key component of the FDIC’s efforts to comply with a Congressional mandate contained in section 7 of the Federal Deposit Insurance Reform Conforming Amendments Act of 2005 (“Reform Act”) (Pub. L. 109-173), which calls for the FDIC to conduct ongoing surveys “on efforts by insured depository institutions to bring those individuals and families who have rarely, if ever, held a checking account, a savings account or other type of transaction or check cashing account at an insured depository institution (hereafter in this section referred to as the ‘unbanked’) into the conventional finance system.” Section 7 further instructs the FDIC to consider several factors in its conduct of the surveys, including: (1) “what cultural, language and identification issues as well as transaction costs appear to most

prevent ‘unbanked’ individuals from establishing conventional accounts”; and (2) “what is a fair estimate of the size and worth of the “unbanked” market in the United States.” The Household Survey is designed to address these factors and provide a factual basis on the proportions of unbanked households. Such a factual basis is necessary to adequately assess banks’ efforts to serve these households as required by the statutory mandate.

To satisfy the Congressional mandate, the FDIC designed two complementary surveys: a survey of FDIC-insured depository institutions and a survey of households. The survey of FDIC-insured depository institutions, aimed at collecting data on their efforts to serve underbanked, as well as unbanked, populations (underbanked populations include individuals who have an account with an insured depository but also rely on non-bank alternative financial service providers for transaction services or high cost credit products), was conducted in mid-2007 and again in 2011. The results of the 2007 survey were released in February 2008 and the results of the 2011 survey were released in December 2012. The first survey of unbanked and underbanked households was conducted in January 2009 as a CPS supplement and the results were released to the public in December 2009. The second survey of unbanked and underbanked households was conducted in June 2011 and the results were released to the public in September 2012. The Household Survey seeks to estimate the proportions of unbanked and underbanked households in the U.S. and to identify the factors that inhibit the participation of these households in the mainstream banking system. The results of these ongoing surveys will help policymakers and bankers understand the issues and challenges underserved households perceive when deciding how and where to conduct financial transactions. This notice addresses the next Household Survey.

DATES: Comments must be submitted on or before [insert date 30 days from publication in the Federal Register].

ADDRESSES: Interested parties are invited to submit written comments by any of the following methods. All comments should refer to “National Survey of Unbanked and Underbanked Households”:

- <http://www.FDIC.gov/regulations/laws/federal/>.
- *E-mail:* comments@fdic.gov. Include the name and number of the collection in the subject line of the message.
- *Mail:* Leneta Gregorie (202-898-3719), Counsel, Legal Division, Federal Deposit Insurance Corporation, 550 17th Street, N.W., Washington, DC 20429.
- *Hand Delivery:* Comments may be hand-delivered to the guard station at the rear of the 550 17th Street Building (located on F Street), on business days between 7:00 a.m. and 5:00 p.m.

FOR FURTHER INFORMATION CONTACT: Interested members of the public may obtain a copy of the survey and related instructions by clicking on the link for the National Unbanked and Underbanked Household Survey on the following web page:

<http://www.fdic.gov/regulations/laws/federal/notices.html>. Interested members of the public may also obtain additional information about the collection, including a paper copy of the proposed collection and related instructions, without charge, by contacting Leneta Gregorie at the address identified above, or by calling (202) 898-3719.

SUPPLEMENTARY INFORMATION:

The FDIC is requesting OMB approval to revise the following collection of information:

Title: National Unbanked and Underbanked Household Survey.

OMB Number: 3064-0167.

Frequency of Response: Once.

Affected Public: U.S. Households.

Estimated Number of Respondents: 45,000.

Average time per response: 12 minutes (0.2 hours) per respondent.

Estimated Total Annual Burden: 0.2 hours x 45,000 respondents = 9,000 hours.

General Description of Collection

A mandate in section 7 of the Reform Act requires the FDIC to conduct ongoing surveys on efforts by banks to bring unbanked individuals and families into the conventional finance system. Section 7 further instructs the FDIC to consider several factors in its conduct of the surveys, including the size of the unbanked market in the United States and the cultural, language and identification issues as well as transaction costs that appear to most prevent unbanked individuals from establishing conventional accounts. To obtain this information, the FDIC partnered with the U.S. Census Bureau, which administered the Household Survey supplement (“FDIC Supplement”) to households that participated in the January 2009 and June 2011 CPS. The FDIC supplement has yielded significant data on the extent and demographic characteristics of the population that is unbanked or underbanked, the use by this population of alternative financial services, and the reasons why some households do not make greater use of traditional banking services. The Household Survey was the first survey of its kind to be conducted at the national level. An executive summary of the results of the first and second Household Surveys, the full reports, and the survey instruments can be accessed through the following link:

<http://www.economicinclusion.gov/surveys/>**Error! Hyperlink reference not valid..**

Consistent with the statutory mandate to conduct the surveys on an ongoing basis, the FDIC already has in place arrangements for conduct of its third Household Survey as a supplement to the June 2013 CPS. However, prior to finalizing the next survey instrument, the FDIC sought public comment on whether changes to the existing instrument were desirable and, if so, to what extent. It should be noted that, as a supplement of the CPS survey, the Household Survey needs to adhere to specific parameters that include limits in the length and sensitivity of the questions that can be asked of CPS respondents. Specifically, there is a strict limitation on the number of questions permitted and the average time required to complete the survey (12 minutes on average).

Comment Discussion

On October 19, 2012 (77 FR 64337), the FDIC issued a request for comment on possible revisions to the 2013 Household Survey. The FDIC received five comments related to this survey effort. All commenters were supportive of efforts to bring unbanked and underbanked households into the financial mainstream.

One commenter suggested that the FDIC drill down further on the reasons for not using conventional/traditional financial institutions and suggested that income, judgments, liens, felony convictions, and “choice” (i.e., personal preference) are possible reasons for being unbanked. The FDIC continues to revise the survey instrument to better capture the full range of reasons why households do not have bank accounts. Answer options for this question have been clarified and streamlined. The 2013 survey adds an answer option that intends to capture households that feel that not having a bank account provides more privacy for personal finances. And, the 2013 survey asks households to select all applicable reasons for not having an account, but also

indicate the most important reason, which will allow us to capture a more complete set of reasons.

Several comments related to the need to better understand households' use of prepaid cards, including the cards' cost structures, and the use of direct deposit in conjunction with prepaid cards. One commenter further suggested that the FDIC consider an alternative unbanked definition that excludes households that regularly use prepaid cards. The FDIC agrees that the use of prepaid cards is relatively high, and increasing, among unbanked and underbanked households. In response, the revised Household Survey asks a number of new questions about prepaid cards that seek to capture the timing of households' prepaid card use, the reasons for using these cards, where they are purchased, and how they are accessed and loaded.

One commenter mentioned the need to better understand households' financial decision-making, especially related to the choice between financial services or products such as: direct deposit vs. check-cashing, prepaid card vs. bank account. The FDIC agrees that this is an area of interest, but capturing this information would require more substantial revisions to survey than we are able to accommodate given the timeframe for the 2013 survey. This comment will be considered in future survey efforts.

Another suggestion referred to gaining further detail on the competitive advantages and disadvantages of financial service providers. The 2013 Household survey includes questions about what methods households use to access bank accounts, as well as locations used to access

alternative financial services. This information should provide additional information regarding consumer preferences for accessing financial services.

One commenter requested that financial education questions be added to the survey. The FDIC recognizes the value of assessing financial education levels in conjunction with the use of financial services and products. However, financial education is difficult to measure at the household level. A good financial education assessment requires including a set of questions that test the respondents' financial capability, which might or might not be representative of that of the household.

Another commenter requested that the survey provide results for smaller demographic groups, and allow for more cross tabulations of data, and suggested having the Household Survey be a part of the American Community Survey (ACS) as opposed to the CPS. The FDIC recognizes the value of having questions regarding banking status administered as part of the ACS, as the ACS's large sample size would allow for analysis at smaller demographic and geographic levels. The FDIC may investigate proposing new ACS content through the content change process managed by OMB and the Census Bureau. However, the current data collection, as part of the CPS, does allow for many meaningful analyses of demographic groups. In many cases, individual users can use the public use dataset from the Census Bureau to perform a wide variety of demographic analyses, including some that may be more detailed than the FDIC published in its own reports on the Household Survey.

The FDIC also received a suggestion regarding the implementation of the survey. The commenter suggested that an in-person survey would facilitate data collection. The Household Survey is a supplement to the Census Bureau's Current Population Survey which is predominantly an in-person survey.

Request for Comment

Comments are invited on: (a) whether the collection of information is necessary for the proper performance of the FDIC's functions, including whether the information has practical utility; (b) the accuracy of the estimates of the burden of the information collection; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the information collection on respondents, including through the use of automated collection techniques or other forms of information technology.

The FDIC will consider all comments to determine the extent to which the information collection should be modified prior to submission to OMB for review and approval. After the comment period closes, comments will be summarized and/or included in the FDIC's request to OMB for approval of the collection. All comments will become a matter of public record.

Dated at Washington, D.C., this 14th day of March, 2013.

FEDERAL DEPOSIT INSURANCE CORPORATION

Valerie J. Best
Assistant Executive Secretary

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